

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

IN RE:

MARLA O'NEIL

NO: 09-44693

MOTION TO EXTEND TIME FOR CREDITORS AND TRUSTEE MAY OBJECT TO
DISCHARGE OF DEBTOR AND/OR DISCHARGEABILITY OF DEBT AND
REQUEST FOR EXPEDITED DETERMINATION

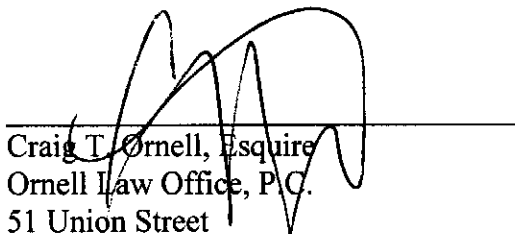
Now comes Jennifer M. White, individually and on behalf of Jenna Desrosiers, a creditor of the Debtor (the "creditors"), and moves for a minimum sixty (60) day extension of the time to object to discharge and/or dischargeability of debt, pursuant to 11 U.S.C. Sections 523 and 727. In support of this motion the creditor states as follows:

1. The Debtor, Marla O'Neil, filed for relief under Chapter 7 of the bankruptcy Code on November 3, 2009.
2. A meeting of creditors was held on December 9, 2009.
3. On December 23, 2009, the Debtor filed a Motion to Amend Pleadings, specifically Schedule F.
4. A review of the schedules indicates that the Debtor did not disclose litigation regarding real estate and a landlord tenant matter that was pending prior to the filing of the petition.
5. At the time of the initial filing the debtor did not list the creditor as part of the original list of creditors.
6. The Debtor transferred property located at 137 Grafton Street, Millbury, MA on February 2, 2007 for no consideration which is less than three years prior to the date of filing the petition.
7. The Debtor continued to rent the property, collect rent, enter into rental agreements regarding the property after the transfer of the property.
8. The Debtor engaged in litigation whereby she filed applications for summary process in her name against tenants.

9. The Debtor is a party in litigation in the Worcester Housing Court 09 cv 502.
10. As part of the litigation the Debtor has filed a counterclaim whereby she claims that the Creditor was a tenant of the Debtor and owed rent.
11. The deadline to file a complaint to object to discharge and/or dischargeability of debt, pursuant to 11 U.S.C. Sections 523 and 727 is March 9, 2010.
12. Additional time is needed for the Creditor to continue her due diligence in anticipation of a Rule 2004 examination of the Debtor, parties who may supply further information, and the documentation to be produced.
13. The Creditor requests for an expedited determination of the Motion.

Wherefore, the Creditor prays that the Court extend the Deadline up to and including May 8, 2010 and for such further relief as is just.

Jennifer White
Individually and on behalf of
Jenna Desorsiers
By their Attorney



Craig T. Ornell, Esquire
Ornell Law Office, P.C.
51 Union Street
Worcester, MA 01608
(508) 797-9655
BBO# 544396

Certificate of Service

I, Craig T. Ornell, certify that I have this day served a copy be electronic notice to US Trustee, Jonathan Goldsmith, Chapter 7 Trustee, Deborah Rhodes Attorney for the Debtor and by fist class Mail, postage prepaid, upon Marla O'Neil, 137 Grafton Street, Millbury, MA 01527.

March 7, 2010



Craig T. Ornell